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November 27, 2023

Hon. James R. Cho
United States Magistrate Judge
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Chad Breland v. City of NY et al
Case No.22cv2207 LDH-JCR

Dear Judge Cho:

I am an attorney of record for plaintiff Chad Breland, and I write to request an adjournment of the hearing on the motion filed by the City of New York asking for a stay in this matter pending resolution of Mr. Breland's second indictment. Today the hearing was scheduled for December 1, 2023. I will be attending and presenting at the United Justice Coalition Summit at the Javits Convention Center on the 1st of December. My presentation time is 11AM to 1PM. I then have other responsibilities for that day as the UJC Summit is a whole day event.

I have conferred with my co-counsel Justin Bonus as well as counsel for the City of New York and we are all available on December 11th or December 20th. I am away the last week in December and the first week in January. Ms. Holohan, who represents the City of New York, is in trial from January 8-12 and I am unavailable on January 17 and 19 and in trial January 23-31 so it appears that January 16 and 18 are also available. Plaintiff would prefer one of the December dates if the Court is available then.

This is the first request for an adjournment of this date. No party opposes the application. Thank you for your attention and courtesy in this matter.

Sincerely,

s/Oscar Michelen

OM:sjk

OSCAR MICHELEN